

CORRESP. CONTROL
INCOMING LTR NO.

03077 RF 94

DUE
DATE

ACTION

DIST.	LTR	ENC
BURLINGAME, A.H.		
BUSBY, W.S.	X	
CARNIVAL, G.J.		
CORDOVA, R.C.		
DAVIS, J.G.	X	
FERRERA, D.W.		
FRAY, R.E.		
GEIS, J.A.		
GLOVER, W.S.		
SOLAN, P.M.		
HANNI, B.J.		
HEALY, T.J.		
HEDAH, T.G.		
HILBIG, J.G.		
HUTCHINS, N.M.		
JACKSON, D.T.		
KELL, R.E.		
KUESTER, A.W.		
MARX, G.E.		
MCDONALD, M.M.		
McKENNA, F.G.		
MORGAN, R.V.		
PIZZUTO, V.M.		
POTTER, G.L.		
SANDLIN, N.B.		
BATTERWHITE, D.G.		
SCHUBERT, A.L.	X	
SCHWARTZ, J.K.		
SETLOCK, G.H.		
STIGER, S.G.	X	
TOBIN, P.M.		
VOORHEIS, G.M.		
WILSON, J.M.		
Peterman, B.	X	
Cowdry, C.	X	
Ticknor, R.	X	

Mr. Joe Schieffelin, Unit Leader
Hazardous Waste Control Program
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Dear Mr. Schieffelin:

On March 15, 1994, we submitted to your office, Technical Memorandum 1 (TM1) pertaining to Operable Unit (OU) No. 9. Your office approved TM1 on April 11, 1994, but requested that active tanks not included in RCRA units be included in the proposed investigations. These tanks include: (1) T-8 in Building 728; (2) T-9 in Building 730; and (3) T-11 & T-30 in Building 731.

We have reviewed the history and current uses of these tanks. We have determined that tanks in OU 9 were included in the RCRA Part A application (enclosed) dated November 1980 as part of the Original Process Waste Lines. All of the active tanks listed above received process wastes as designated in the Part A application. Currently, non-hazardous wastes from the plenum deluge retention system are received by those tanks. There are no plans to seek a Part B Permit for T-8, T-9, T-11 or T-30.

We have determined that the T-11 and T-30 tanks listed in the Interagency Agreement (Agreement) are in fact not the active tanks in the 731 building and that the T-30 tank is part of the 731 building. The active tanks are free standing tanks that support the vital safety system and are used for temporary storage of plenum deluge water (non-hazardous). Therefore, we will prepare a plan for investigation of the T-11 and T-30 tanks and submit this plan to Colorado Department of Public Health and Environment (CDPHE) for approval as an OU 9 TM1 enclosure.

The T-8 and T-9 tanks also support the site's vital safety system and are used for plenum deluge retention. These tanks may receive small quantities of water when the plenum deluge system is periodically tested. As support to the vital safety system, continued use of these tanks is essential to support building operations. Removal of the T-8 tanks would significantly impact the solution stabilization program. The T-9 tanks are adjacent to the T-10 tanks, which will be investigated as part of the activities proposed in TM1. Both the T-9 and T-10 tanks are housed in building 730.

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Reviewed for Addressee
Corres. Control RFP

8-8-94 *gjo*
DATE BY

Ref Ltr. #

DOE ORDER # 5400.1

ADMIN RECORD

A-OU09-000145

Department of Energy

ROCKY FLATS OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928

AUG 05 1994

ROCKY FLATS PLANT
CORRESPONDENCE CONTROL
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EC-94-DOE-07880

36846

AUG 05 1994

J. Schieffelin
94-DOE-07880

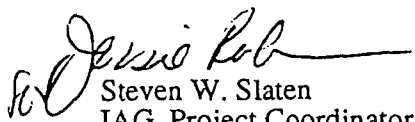
2

We believe that investigation of the T-8 and T-9 tanks while they are still active would be wasteful of funds because of the potential for recontamination from continued use. We propose, therefore, to modify the scope of work, pursuant to Part 32 of the Agreement. It is our determination that this modification to the investigation work is necessary to accomplish the objectives of this Agreement. Accordingly, we propose that the work plan for OU 9 also be amended to reflect this modification. This modification of work will ultimately remove tanks T-8 and T-9 from investigation as part of the OU 9 Work Plan. Therefore, we will defer the investigation of the T-8 and T-9 tanks at this time while we prepare for and implement RCRA closure. Operations Division will submit the closure plan during FY95. We will make every effort to complete the closure expeditiously so as to not impact future OU9 milestones. Once the closure is complete the tanks will be removed from the scope of work under the Agreement pursuant to Part 32.

We feel that the revisions made to the OU 9 TM1, which was submitted to the CDPHE on June 23, 1994, and the proposals made for the active tanks that are included in this letter adequately address the issues raised in CDPHE's letter of April 11, 1994. Therefore, we assume that the TM1 is fully approved and we are proceeding at this time to implement the investigations proposed in TM1 and in this letter.

If you have any questions, please contact Regina Sarter of the Environmental Restoration staff at 966-7252.

Sincerely,


Steven W. Slaten
IAG Project Coordinator

Enclosure

AUG 05 1994

J. Schieffelin
94-DOE-07880

3

cc w/o Enclosure:

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